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**American  
Chemistry  
Council**  
*Good Chemistry  
Makes It Possible*

December 14, 2001

Christine Todd Whitman, Administrator  
U.S. Environmental Protection Agency  
P. O. Box 1473  
Merrifield, VA 22116

RE: Phthalate Esters Panel Test Plans for Phthalate and Trimellitate Esters;  
HPV registration number [REDACTED]

Dear Ms. Whitman:

The Phthalate Esters Panel HPV Testing Group of the American Chemistry Council submits its test plans for Phthalate and Trimellitate Esters under the High Production Volume (HPV) Challenge Program. However, they are not volunteered in the HPV program, because they are described in the test plans and noted here for information purposes and are already part of the OECD SIDS program.

<u>Chemical Name</u>	<u>CAS Number</u>
1,2-benzenedicarboxylic acid, dibutyl ester	84-74-2
1,2-benzenedicarboxylic acid, butylbenzyl ester	85-68-7
1,2-benzenedicarboxylic acid, di(2-ethylhexyl)ester	117-81-7
1,2,4-benzenetricarboxylic acid, tris (2-ethylhexyl) ester	3319-31-1
1,2-benzenedicarboxylic acid diisononyl ester	28553-12-0
1,2-benzenedicarboxylic acid, di-C8-10-branched alkyl esters, C9 rich	68515-48-0
1,2-benzenedicarboxylic acid, di-C9-11-branched alkyl esters, C10 rich	68515-49-1

Thus, data presentation and any needed testing for these seven chemicals will occur through the OECD program. The Phthalate Esters Panel HPV Testing Group will, where appropriate, use these chemicals for data read across purposes.

In preparing this test plan, the Panel has given careful consideration to the principles contained in the letter EPA sent to all HPV Challenge Program participants on October 14, 1999. As requested by EPA in that letter, the Panel has sought to maximize the use of scientifically appropriate categories of related chemicals and of structure activity relationships. Additionally, and also as requested in EPA's letter, in analyzing the adequacy of existing data, the Panel has conducted a thoughtful, qualitative analysis rather than use a rote checklist approach. The Panel has taken the same thoughtful approach when developing this revised test plan and believes it conforms to those principles.



Responsible Care®

Christine Todd Whitman, Administrator  
December 14, 2001  
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If you have any questions, please call Marian Stanley, Manager Phthalate Esters Panel at (703-741-5623), e-mail [Marian\\_St Stanley@americanchemistry.com](mailto:Marian_St Stanley@americanchemistry.com).

Courtney M. Price  
Vice President, CHEMSTAR

cc: C. Auer, EPA  
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